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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
MAHER FAYEZ KARA, and)
MOUNIR FAYEZ KARA)
(also known as MICHAEL F. KARA),)
)
Defendants.)

Case No. CR 09 – 0417 EMC

STIPULATION AND
[PROPOSED] ORDER

WHEREAS, on July 6, 2011, Maher Kara pled guilty and agreed to cooperate with the
government's ongoing insider trading investigation;

WHEREAS, on July 13, 2011, Mounir Kara pled guilty and agreed to cooperate with the
government's ongoing insider trading investigation;

WHEREAS, on September 1, 2011, Bassam Yacoub Salman was indicted on charges
related to this insider trading scheme;

1 WHEREAS, on May 9, 2012, the Court scheduled trial in *United States v. Salman* to
2 begin on March 4, 2013;

3 WHEREAS, the parties (1) now anticipate that Maher Kara and Mounir Kara will both be
4 witnesses for the government in the upcoming trial pursuant to their respective cooperation
5 agreements; (2) request that the sentencing hearings for their respective cases be adjourned until
6 after the March 4, 2013 trial so they may complete their cooperation; and (3) request that the
7 status conference in these cases now scheduled for December 12, 2012 at 2:30 p.m. therefore be
8 postponed to a date that is convenient for the Court in June 2013.

9 THEREFORE, it is hereby stipulated by and between the parties, through their respective
10 counsel of record, that the time from December 12, 2012 to a date that is convenient for the
11 Court in June 2013 shall be excluded in computing the time within which the trial of the offense
12 alleged in the Indictment must commence under Title 18, United States Code, Section 3161 for
13 defendants Maher Kara and Mounir Kara.

14 DATED: December 11, 2012

MELINDA HAAG
United States Attorney

15
16 /s/

17 _____
Robert S. Leach
Assistant United States Attorneys

18 /s/

19 DATED: December 11, 2012

20 _____
Carl H. Loewenson, Jr.
George C. Harris, Esq.
MORRISON & FOERSTER, LLP
Counsel for Maher Kara

21
22 /s/

23 DATED: December 11, 2012

24 _____
Miles Ehrlich, Esq.
Ismail Ramsey, Esq.
RAMSEY & EHRLICH LLP
Counsel for Mounir Kara

On the basis of material submitted to the Court,

IT IS HEREBY ORDERED that:

The ends of justice are served by finding that a continuance of the status hearing for defendants Maher Kara and Mounir Kara from December 12, 2012 to June ¹⁹, 2013 outweighs the best interests of the public and the defendants in a speedy trial and the prompt disposition of criminal cases and the Court concludes that the exclusion of time from December 12, 2012 to June ¹⁹, 2013 should be made under Title 18, United States Code, Sections 3161(h)(7)(B)(iv).

DATED: 12/12/12

